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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA)	Cause No. CV 20-52-BLG-SPW
MAPLEY,)	
)	
Plaintiffs,)	JOINT STATEMENT OF
)	INABILITY TO STIPULATE TO
)	ANY FACTS
vs.)	
)	
WATCHTOWER BIBLE AND)	
TRACT SOCIETY OF NEW YORK,)	
INC., WATCH TOWER BIBLE AND)	
TRACT SOCIETY OF)	
PENNSYLVANIA, and BRUCE)	
MAPLEY SR.,)	
)	
Defendants.)	
)	
)	

WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC.

Cross-Claimant,

vs.

BRUCE MAPLEY SR.,

Cross-Claim Defendant.

Pursuant to L.R. 16.2(b)(3) and the Court's Order Providing for Jurisdictional Discovery dated August 14, 2020 (Doc. 32), counsel for Plaintiffs Tracy Caekaert and Camillia Mapley, and counsel for Defendants Watchtower Bible and Tract Society of New York, Inc. (hereinafter "WTNY"), and Watch Tower Bible and Tract Society of Pennsylvania (hereinafter "WTPA"),¹ conferred and were unable to stipulate to any facts at the present time. Pursuant to L.R. 11.2(a)(1), all counsel consent to the electronic filing of this Joint Statement of Inability to Stipulate to Any Facts by counsel for WTNY and WTPA.

¹ WTPA's involvement in this Joint Statement of Inability to Stipulate to Any Facts does not constitute a waiver of its arguments that it is not subject to either the general or specific personal jurisdiction of this Court so that Plaintiffs' claims against it should be dismissed with prejudice for lack of personal jurisdiction pursuant to Rule 12(b)(2), Fed.R.Civ.P. All such arguments are specifically reserved.

DATED this 30th day of September, 2020.

By: /s/ Ryan Shaffer
Robert L. Stepan
Ryan R. Shaffer
James C. Murnion
MEYER, SHAFFER & STEPANS, PLLP
Attorneys for Plaintiffs

By: /s/ Guy W. Rogers
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Watch Tower Bible and Tract Society of
Pennsylvania*

CERTIFICATE OF SERVICE

I hereby certify that, on September 30, 2020, a copy of the foregoing was served on the following person(s):

1. U.S. District Court, Billings Division
2. Robert L. Stepan
Ryan R. Shaffer
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by the following means:

<u>1, 2</u> CM/ECF	<u> </u> Fax
<u> </u> Hand Delivery	<u> 4 </u> E-Mail
<u> 3 </u> U.S. Mail	<u> </u> Overnight Delivery Services

By: /s/ Guy W. Rogers
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Inc., and Watch Tower Bible and
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